

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**VANGUARD IDENTIFICATION SYSTEMS,
INC.,**

Plaintiff,

v.

RONNIE E. GOADE, SR., et. al.

Defendants.

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CIVIL ACTION

NO. 02-2943

**AFFIDAVIT OF DAVID J. PERLMAN, ESQUIRE IN SUPPORT OF
OBJECTIONS TO DEFENDANTS' BILL OF COSTS**

I, David J. Perlman, Esquire, being duly sworn according to law, depose and says:

1. I am over 18 years of age and an attorney at law representing the Plaintiff in this action. I have personal knowledge of the facts set forth in this Affidavit. If called upon as a witness, I would testify competently.

2. The charges for remote video conferences were unnecessary and I do not believe they are allowed under 28 U.S.C § 1920. The Defendants' Supplemental Declaration shows such a fee in three instances: I(b)(ii)(\$1,980.00); I(c)(ii)(\$2,070); I(e)(i)(\$1,322.50). In each case, Defendants' counsel opted not to travel to the location of the witness or deposition in order to participate in the deposition.

3. Secondly, the fee for a copy of a videotape was unnecessary when the transcript was available, and, I believe, not allowed by 28 U.S.C. § 1920. Defendants list such charges in four instances: I(b)(iii)(\$534.25); I(c)(iii)(\$165.00); I(d)(ii)(\$80.00); I(e)(iii)(\$225.00).

4. Also, the photocopying charge of \$2.004.86 appears excessive. At a charge of \$0.8

per page, that would be over 25,000 pages of photocopying. Moreover, absolutely no support for this charge is provided other than a line-time on an attorney's bill.

AFFIANT:

DAVID J. PERLMAN, ESQUIRE

SWORN AND SUBSCRIBED TO BEFORE ME

THIS ____ DAY OF _____, 2005.

(seal)

Notary Public